

1 SOLOMON E. GRESEN, ESQ. (SBN 164783)

2 **RGLAWYERS, LLP**

3 16200 Ventura Blvd., Suite 407A

4 Encino CA 91436

5 Tel: (818) 815-2737

6 Fax: (818) 815-2737

7 *seg@rglawyers.com*

8 JASON M. INGBER, ESQ. (SBN 318323)

9 **Law Offices of Jason M. Ingber**

10 3580 Wilshire Blvd., Suite 1260

11 Los Angeles, CA 90010

12 Tel: (310) 270-0089

13 *ji@jasoningber.com*

14 Attorneys for Plaintiff, Andrea Love

15 **UNITED STATES DISTRICT COURT**

16 **CENTRAL DISTRICT OF CALIFORNIA**

17 **ANDREA LOVE**, an individual,

18 Plaintiff,

19 vs.

20 **ELLEN STONE**, an individual; and DOES 1
21 through 25, inclusive

22 Defendants.

Case No.: 2:23-cv-3122

**COUNSEL JASON M. INGBER'S
DECLARATION IN SUPPORT OF
PLAINTIFF'S EX-PARTE APPLICATION
TO REFILE THE NOTICE OF MOTION
AND MOTION TO REMAND REMOVED
ACTION WITH CORRECT HEARING
DATES**

(28 U.S.C.S. §1447(c))

Complaint Filed: 2.28.2023
LASC Case No.: 23STCV04399

1 1. I, Jason M. Ingber, work for RGLaywers LLP and Solomon Gresen and am co-
2 counsel for Plaintiff and lead trial counsel for this matter and if called upon to testify could and
3 would testify to the following under the penalty of perjury.

4 2. On June 21, 2023, this Court allowed Plaintiff to re-file her Motion for Remand by
5 Friday June 23, 2023.

6 3. I was so focused on the procedure of the Motion and under pressure to timely and
7 correctly file the Motion that I inadvertently misdated the Motion and used the wrong year when
8 inputting the information for the docket entry.

9 4. I am humiliated by this mistake as I spent numerous hours on the Motion and
10 understand that this Court has provided Plaintiffs with numerous chances to file this Motion.

11 5. I will employ belt and suspenders approach to every filing in this action.

12 6. Please do not prejudice Plaintiff for her counsel's oversight.

13 7. On June 26, 2023, I called defense counsel Brook Hammond twice to inform her
14 of the accompanying ex-parte at her office line, but she did not pick up her phone.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct. Executed this 27th day of June 2023, in Los Angeles, California.

17 /s/ Jason M. Ingber

18 Jason M. Ingber
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